

Stewart Engineering

Frank M. Stewart, P.E.

◆email fstewart@latmt.com

3250 Prairie Smoke Road ◆ Bozeman, MT 59715 ◆ Phone (406) 586-0790

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Ms. Carrie Greely
Dept. of Environmental Quality
1520 E. Sixth Ave
PO Box 200901
Helena, MT 59620-0901
deqwqpadmin@mt.gov

Subject: Comments related to proposed variances for wastewater dischargers

Dear Ms. Greely:

I have reviewed Circular DEQ-12B and the related proposed New Rules 1 – 5 Nutrient Standards Variances. I am in favor of the goals of DEQ12A (tightening discharge standards) and also in favor of the goals of DEQ12B (allowing temporary variances in cases where achieving the new standards is not currently practical).

In cases where the DEQ is considering the allowance of general or individual variances, I think it would be reasonable for the DEQ to require some additional treatment to be initiated at these facilities in order to improve the quality of the discharge water, even if the new standards cannot be fully achieved in the short term. Possible additional treatment might include floating treatment wetlands, constructed wetlands, and “treatment-in-a-box” add-on systems.

I have extensive experience related to basic research and product development of floating treatment wetlands for wastewater treatment (I have served as Principal Investigator and Co-PI on two State-sponsored grants with Floating Island International, Inc., and I am a shareholder in the corporation). I believe that floating treatment wetland products are a viable alternative for enhanced treatment, particularly at facilities that need to optimize nutrient reduction within existing infrastructures. I encourage the DEQ to carefully consider the use these products when reviewing requests for variances. Additionally, since floating treatment wetlands are considered to be an emerging technology in Montana, I think it would be appropriate for the DEQ to encourage their implementation by helping communities obtain funding to install these systems.

Please let me know if you have questions or require additional information related to wastewater treatment with floating treatment wetlands.

Sincerely,